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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICOLE GILILLAND, an individual

No. 6:19-cv-00283-MK

Plaintiff,

vs.

**DECLARATION OF LUKE REESE
IN SUPPORT OF RESPONSE TO
PLAINTIFF'S ATTORNEY'S
MOTION TO WITHDRAW**

SOUTHWESTERN OREGON
COMMUNITY COLLEGE DISTRICT
by and through its BOARD OF
EDUCATION, an Oregon community
college district and board;
SOUTHWESTERN OREGON
COMMUNITY COLLEGE, an Oregon
community college; PATTY SCOTT,
an individual; TIM DAILY, an individual;
FRANCISCO SALDIVAR; an individual;
SUSAN WALKER, an individual;
MELISSA SPERRY, an individual;
PAMELA WICK, an individual,

Defendants.

I, Luke W. Reese, under penalty of perjury, do hereby declare and say:

1. I am the attorney of record for Defendants and make this Declaration in support of Defendants' Response to Plaintiff's Attorney's Motion to Withdraw.

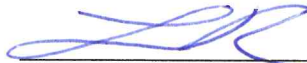
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2. Attached hereto as *Exhibit 1* are true and correct copies of several emails received from Plaintiff Nicole Gililand relating to her attorney's withdrawal and her subsequent demands.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 3rd day of February 2020.



Luke W. Reese, OSB No. 076129
Garrett Hemann Robertson P.C.
lreese@ghrlawyers.com
Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **Declaration of Luke Reese in Support of Response to Plaintiff's Attorney's Motion to Withdraw** on the date indicated below,

- ☒ Via First-Class Mail with postage prepaid
- ☒ Via Electronic Filing
- ☐ Via Facsimile Transmission
- ☐ Via Hand Delivery
- ☐ Via Overnight Delivery

to the following person(s) a true copy thereof, contained in a sealed envelope (if other than by facsimile transmission), addressed to said person(s) at their last known addresses indicated below:

Nicole Gililand
PO Box 158
51668 Blue River Drive, #4
Blue River OR 97413
Email: nicolegililand15@gmail.com
Plaintiff *pro se*

KEVIN C. BRAGUE
The Brague Law Firm
1205 NW 25th Avenue
Portland OR 97210
OSB No. 050428
Phone: 503-922-2243
Fax: 503-226-3131
Email: kevin@braguelawfirm.com
Attorney for Plaintiff

Nicole Gililand
608 Grant Avenue, #19
Ogden UT 84404
Plaintiff *pro se*

DATED February 3, 2020

GARRETT HEMANN ROBERTSON P.C.

s/ Luke W. Reese

Luke W. Reese (OSB No. 076129)
lreese@ghrlawyers.com
Shayna M. Rogers (OSB No. 134698)
srogers@ghrlawyers.com
Phone: 503-581-1501
Fax: 503-581-5891
Of Attorneys for Defendants

4834-7321-6179, v. 1

From: Luke Reese
Sent: Wednesday, January 15, 2020 4:17 PM
To: 'kevin@braguelawfirm.com'
Subject: FW: Hello

Kevin,

I received the below email from Ms. Gililand. As you are the attorney of record, I will not be responding. Please contact me at your convenience to let me know how Ms. Gililand intends to proceed.

Sincerely,

Luke Reese
Garrett Hemann Robertson P.C.
Willamette Professional Center • 1011 Commercial St. NE Salem, Oregon 97301-1049
(503) 581-1501 • 1-800-581-1501 • Fax (503) 581-5891 • www.ghrlawyers.com Confidentiality Notice: This email and any attachments contain attorney privilege and confidential information intended only for the use of the individual or entity named above. Any dissemination, distribution, and copying of this email to unintended parties are strictly prohibited. If you have received this email in error, please immediately notify us by email or telephone.

-----Original Message-----

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Wednesday, January 15, 2020 3:32 PM
To: Luke Reese <lreese@ghrlawyers.com>
Subject: Hello

Mr. Reese,

My name is Nicole Gililand, in the plaintiff in the case against SWOCC. This email is to inform you that I will temporarily be representing myself, so relay all communications to me for now. I'm working on filing a motion to get a hearing as soon as possible. I'm hoping to get us all in front of the judge so I can alert him to the amount of illegal corruption going into the attempts to shut down this important case. Thankfully I finally have enough evidence to prove it and I need to get it on the record.

Please be patient with me, I don't head to law school until next year, so I'm not as sharp as Kevin. I've only got a few law students that still have their integrity helping me in the meantime.

See you soon,
Nicole

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Monday, January 20, 2020 7:11 PM
To: Luke Reese
Subject: Re: Last Possible Opportunity

I've already told you I am representing myself. Do you think I'll fill you in on who's helping me BEFORE I expose what happened to Kevin in the first place? No. By the time you know who's in my corner, it'll be too late. How many attorneys have been spooked away from doing their jobs in my case so far? 4? 5? Yet look how far I've gotten anyway! That had to tell you something. Sure, it took me awhile, but this is me learning my lesson.

Fine, let's keep doing this your way.

Have a great night,
 Nicole

Sent from my iPhone

> On Jan 20, 2020, at 7:00 PM, Luke Reese <lreese@ghrlawyers.com> wrote:

>

> Ms. Gililand,

>

> Mr. Brague's motion to withdraw as your attorney has not been granted by the court, so I am ethically prohibited from communicating with you directly. However, I am responding with a copy to Mr. Brague to confirm receipt and to let you know I will not be able to communicate directly with you while you are represented.

>

> I understand you are looking for new counsel. Once you have retained a new lawyer, please have him or her write to me and we can discuss the issues that are outstanding in your case and next steps.

>

> Sincerely,

>

> Luke Reese

>

>> On Jan 20, 2020, at 6:04 PM, Nicole Gililand <nicolegililand15@gmail.com> wrote:

>>

>> Mr. Reese,

>>

>> Kevin is still a little dense, he's not seeing the writing on the wall here regarding his own career. After two years of these evil and corrupt attempts to shut me down- everyone on your side should've figured out by now that you're not dealing with a stupid or ghetto whore (stigmas are dangerous that way).

>>

>> If any of you remaining feel the need to talk settlement before you drag this entire state (possibly the entire DNC) down with your bigoted clients, now is a good time. Unfortunately this is the risk that's run when more and more favors are called in to bury a problem instead of doing what you should've done from the start- fix it.

>>

>> This whole gaslighting thing you all love to do where you paint me as vindictive and seeking vengeance doesn't hold water when you compare the actions of you all to the actions of myself. I have been repeatedly and illegally targeted and the entire time -I've only begged for it to end.

>>

>> I'm not playing a game of chicken Mr. Reese. I will crash into those who are playing though, and I'm driving a tank (that's what happens when you're the only one telling the truth and have mountains of evidence to prove it).

>>

>> At this point I'm glad Kevin fell apart before he would meet me and go over my files and everything I've found. You only think you know all of it. Next time ask the lawyers that you turn to pretend to pretend better.

>>

>> Tomorrow I have five conference calls set up with lawyers, sex worker advocates, famous comedians with podcasts, and trustworthy journalists (that's just so far). I've already told VICE that they can either publish or get scooped. So this actually is the last opportunity to fix this quietly.

>>

>> Even Governor's aren't invincible to accountability! But on the plus side, I may be the first whore to take one down without having sex with them first. I have the full weight of the actual sex workers moment behind me and we are tired of fake progressives and fake friends.

>>

>> Let me know. Or don't.

>>

>> Nicole R. Gililand

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Thursday, January 23, 2020 10:21 AM
To: Luke Reese; Kevin Brague
Subject: Demands

Be sure and let me know if you all want to reconsider my demands before this gets any worse. Tell your "clients" I will die before I let my case get buried. I already tried to give up once, that won't be happening again. Start deciding what matters most in this situation.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Thursday, January 23, 2020 1:40 PM
To: Kevin Brague; Luke Reese
Subject: Strategy

Come on fellas, I'm trying to strategize here. Kevin would know this about me if he'd ever bothered to actually meet me and review my evidence.

I'm about to graduate top of my class in political science with national honors, I GET IT! But this entire time, I've been trying to let the people in power off the hook here! That's not up for debate! It has only gotten this big because your own biases and ignorance.

MOST of this evidence makes it REALLY easy to lockup my alt-right brother in law who started all of this and "conned the system for revenge." I'm not the stubborn one here. I'll gladly and publicly thank Brown for "addressing this when it was brought to her attention." You all get to be the winners here and advance your fake-progressive agendas!

I just want out. I want to take my settlement that I'm SO VERY ENTITLED TO and get the hell out of this fucked up state. Work with me here to end this, and it'll end well. You had to have heard the whispers of all sorts of people helping me on this. We can all work together and have a happy ending to this madness.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Thursday, January 23, 2020 1:56 PM
To: Kevin Brague; Luke Reese
Subject: Sex Workers

Sex workers don't want to alienate the DNC anymore than we have to on this one. We're not as stupid as our clients will lead you to believe.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Thursday, January 23, 2020 8:08 PM
To: Kevin Brague; Luke Reese; glynkpete@gmail.com
Subject: Think About it Guys

Think really hard as you review what evidence you do have, you've been played by the alt-right in Coos Bay. Think about everyone in Coos Bay that has committed perjury to try to paint me as the threat here. I'm not the threat to progress in Oregon, but I can lay the smack down on those actually responsible here. When I say I've never been the enemy to the people in charge, I mean that and my actions and the evidence support it.

We've only all been played and conned into perceiving each other as the threats. In the next couple of days, I'm going to get you a letter that proves I'm not working alone. Other more powerful attorneys from out of state are indeed helping me.

I have been rattling cages all over this state. It's not out of malice, but a tactic to see what I find. Once you understand that, you understand me. These people only get sloppy when they're worried their lies aren't holding up. I have rattled the cages of the racist GOP, and Oregon Liberals- I know who's actually doing the attacking here.

Once you have that letter, you'll have 24 hours to start working with us, or we will help the libertarians with my case instead. The monetary sum goes up drastically after that too. I'm so sick of being handled and treated like an idiot when I'm the one who's put the most effort in by far to actually sort this mess out.

Nicole

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Monday, January 27, 2020 12:20 PM
To: Kevin Brague; Luke Reese
Subject: Strange

Still haven't gotten my files boys 🤔. That's alright, I'm out of state now. I'm regrouping with my new legal team and documentary crew. The documentary is less about porn and more about the deep seeded corruption in Oregon. I'll get you an address for those files that I expect to arrive quickly afterwards.

Or you can let me know about that settlement before you both end up in prison. Every once in awhile, even a well-oiled corruption machine fucks with the wrong person. Get over it.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Wednesday, January 29, 2020 6:10 PM
To: Luke Reese
Subject: FBI

The FBI in Salt Lake City was a lot more interested in my story than the ones in Oregon. They're particularly interested in a Zip drive that ties SWOCC to the Oregon 3%. They're also pretty interested in how much of an effort has been put into covering all of that up. They don't have any of the evidence yet, but they said they'll be in touch.

Let me know if you're ready to discuss a confidential settlement before you drag the entire state down with your fucked up clients.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Wednesday, January 29, 2020 6:23 PM
To: Luke Reese

If I can convince my favorite celebrity based on my evidence, pretty sure I can convince the FBI or basically anyone else.
 Better decide fast 😊

TFW LTE 7:20 PM 46%
 < All Inboxes 3 Messages ^ v

nicolegililand15@gmail.com 6:23 PM
 I just left the FBI to talk to Luke. They were prob...



doug stanhope 6:26 PM
 To: nicolegililand15@gmail.com

Re: Update

Never let anyone call you crazy.

Mentioned you on the podcast that goes out soon -
 was supposed to be today but maybe friday.
 Apologies for fucking up your name 75 times.
 We've been drinking quite a bit on this working
 vacation.

xoxo
 stanhope

See More



nicolegililand15@gmail.com 6:39 PM
 Thanks for that laugh, really needed it. See...

Sent from my iPhone

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Thursday, January 30, 2020 5:05 PM
To: Luke Reese
Subject: So no?

Zip drive is copied and in several hands. Last chance Mr. Reese. Pretty safe to say my demands are minimal considering how much is at stake 🤔. I've never been unreasonable, but you can bet I am very ticked off at this point. Oh and be sure to checkout Stanhope's new podcast.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Friday, January 31, 2020 5:03 AM
To: Luke Reese
Subject: Game Time

Today I trade my evidence to the Utah government for protection and assistance. I will most likely be withdrawing the Title IX and instead filing a several other cases for the multitude of other serious civil rights violations I've endured since. I'm coming after all of you and at least this way I'll actually get a the justice I deserve.

Thoughts and prayers.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Saturday, February 01, 2020 8:14 PM
To: Kevin Brague; Luke Reese
Subject: Lol

Uploading the end of your freedom and careers to all sorts of agencies right now. Great job sinking your entire state gentlemen. I'll be seeing you at your individual trials 🙏😏. Oh sorry, you thought I'd be in a mental institution. Can't wait for your juries to hear about that.

Pleasure doing business with you. I feel sorry for your families that you weren't more reasonable sooner.

Sent from my iPhone

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Sunday, February 02, 2020 2:02 PM
To: Luke Reese
Subject: Tomorrow

You have until tomorrow at noon to present a serious offer. After that, you get to go down with them too. Working on thirteen new tort claims that go into action then. One has your name on it. Playtime is over.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Sunday, February 02, 2020 2:32 PM
To: Luke Reese
Subject: Goes without saying..

That implicating yourself in violating my civil and Constitutional rights via domestic terrorism isn't really something to take lightly.

From: Nicole Gililand <nicolegililand15@gmail.com>
Sent: Sunday, February 02, 2020 7:05 PM
To: Luke Reese
Subject: Update
Attachments: voicemail-4.m4a

Just in case you aren't up to date on the current seriousness of everything, read this. Also, checkout the video on my Facebook of the deputy that tried to illegally search my home after I was the one that called them due to being the victim of assault.

Your clients really need a new playbook. They already had my children kidnapped once and gave them to members of your fun little hate group where they both suffered from abuse.

When I say you're all going to prison if you don't end this, I mean that. I don't mind 13 new juries seeing these things on top of the one in this particular case.

You're a thug Mr. Reese, and unfortunately not a very intelligent one. This has gotten beyond out of control (for you anyway). There won't be a Coos Bay by the time I'm finished, let alone a college.

Sent from my iPhone

Begin forwarded message:

From: Nicole Gililand <nicolegililand15@gmail.com>
Date: January 27, 2020 at 10:14:16 AM MST
To: Glyn Peterson <glynkpete@gmail.com>, Alex Andrews <alex@swopusa.org>
Subject: Update

Now that we're officially across state lines, I wanted to update you on some details/evidence of the last couple of days.

First off, I understand how I was coming across, but I'm hoping this email will help understand what we were dealing with and just how terrifying it was.

When Daymon had his meltdown, I wasn't sure if it was the normal type of meltdown (when his anxiety reaches a certain point, he'll lose it and that's when he can become violent). Now I'm pretty sure that's what's happened. I just couldn't allow it given the situation we were in, so I called the police.

You both have seen the video and description of what happened after I called the police. Here's just a couple more things to add.

This is one of the bruises the police ignored as they were telling me that Daymon and them are "really concerned" for my mental health and my children-

They didn't run Daymons ID or even attempt to look into the no contact order. Once I finally got them to go, they just gave Daymon a ride to Eugene and dropped him off.

He called shortly afterwards and told me they were coming back to take the girls. I took it as a threat given the situation. Later when I was calm, I heard him out.

He said the entire drive down the police were doing everything to get him to say he was concerned about me. They said they were there to help him deal with the situation (not unlike what occurred after my suicide attempt). He told me he gave them nothing to work with, but he could see their frustration and that I needed to get the girls and get out of the state ASAP.

I called close friends to come from Utah to come and get us (something they've been begging to do for awhile). One of them left pretty much right away. I told you, I have a wonderful chosen family.

When my friend finally arrived at the trailer, we were waiting outside and ready to go. It took me only a couple of minutes to load the trunk and the girls. That suitcase I thought Daymon had given to the neighbors, he had actually just hid because of the police coming.

Anyway, as we were loading the car- we were being watched by a state trooper. Once we drove away, Daymon started getting calls from a blocked number, a lot of them.

It was the police. We assume they were calling to tell him I was trying to leave with the kids and see if he wanted to change his tune about any concerns. One call left a voicemail. See if either of you can make out the radio chatter, I haven't had a moment to give it a thorough review.

Anyway, that's all for now. I'm calm and feeling much better now that we're gone. I'm still not giving up the case though and I never will until they give me back the life they stole. I keep being told to start over, but what's the point now? I have no more student loans after this degree. I'm buried in debt and if they can take all of this work from me like this, they can do it again and again. My girls deserve the life I have worked for years to give them.

Niki